

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

Ronald Beverly, Sr.,

Plaintiff,

v.

Thompson Reuters Corporation

3 Times Square

New York, NY 10036

and

West Publishing Corporation

610 Opperman Drive

Saint Paul, MN 55123-1340

and

John Does 1-10

and

X, Y, Z Corporations

Defendant.

No.

NOTICE OF REMOVAL

Defendants Thomson Reuters Corporation (incorrectly named as “Thompson Reuters Corporation”) and West Publishing Corporation (collectively “Defendants”), through their undersigned counsel, Reed Smith LLP, hereby remove this action from the Court of Common Pleas, Montgomery County, Pennsylvania to the United States District Court for the Eastern District of Pennsylvania, and in support state as follows:

1. Plaintiff Ronald Beverly, Sr. (“Plaintiff”) commenced this action in the Court of Common Pleas, Montgomery County, Pennsylvania, by filing a Complaint on December 22, 2011, a true and correct copy of which is attached hereto as **Exhibit A**.

2. On December 28, 2011, Plaintiff filed an Amended Complaint, a true and correct copy of which is attached hereto as **Exhibit B**.

3. On December 29, 2011, Defendants Thomson Reuters Corporation and West Publishing Corporation were served with the Complaint by certified mail.

4. To date, no further pleadings have been filed and no further proceedings have occurred in the Montgomery County Court litigation.

5. In Plaintiff's Complaint, he purports to set forth claims under the Fair Credit Reporting Act, 15 U.S.C. §§ 1681 *et seq.*

6. Removal of this action is proper under 28 U.S.C. § 1441(a), which allows for the removal of any civil action over which the district courts of the United States would have original jurisdiction.

7. The Notice of Removal is timely under 28 U.S.C. § 1446(b) because it is being filed within thirty (30) days of receipt "through service or otherwise, of a copy of the initial pleading setting forth the claim for relieve upon which such action or proceeding is based"

8. This Court has original jurisdiction over this action because Plaintiff's claims are "founded on a claim or right arising under the ... laws of the United States." See 28 U.S.C. § 1441(b). More specifically, original jurisdiction is present in this action because Plaintiff's alleged claim under the Fair Credit Reporting Act presents a federal question. See 28 U.S.C. § 1331.

9. Accordingly, had Plaintiff's Complaint been brought in the United States District Court for the Eastern District of Pennsylvania originally, this Court would have had original jurisdiction over the subject matter under 28 U.S.C. § 1331. As a result, this action is properly removable to this Court pursuant to the provisions of 28 U.S.C. § 1441.

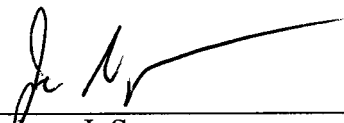
10. Pursuant to 28 U.S.C. § 1441(a), this action may be removed to the "district court of the United States for the district and division embracing the place where such action is

pending.” The Montgomery County Court of Common Pleas is located within the Eastern District of Pennsylvania.

11. Written notice of the filing of this Notice of Removal, together with a copy of this Notice of Removal, will be served promptly upon all Parties and filed with the Court of Common Pleas, Montgomery County, Pennsylvania, in accordance with 28 U.S.C. § 1446(d).

12. No admission of fact, law or liability is intended by this Notice of Removal, and Defendants Thomson Reuters Corporation and West Publishing Corporation expressly preserves all of their defenses, denials and/or objections to Plaintiff’s Complaint and each and every allegation thereof.

WHEREFORE, Defendants Thomson Reuters Corporation and West Publishing Corporation request that the above-captioned action be removed from the Court of Common Pleas, Montgomery County, Pennsylvania, to the United States District Court for the Eastern District of Pennsylvania, and that all further proceedings in this action be held before this Court.



Andrew J. Soven
Attorney I.D. No. 76766
Joe N. Nguyen
Attorney I.D. No. 93638
REED SMITH LLP
2500 One Liberty Place
1650 Market Street
Philadelphia, PA 19103-7301
215-851-8100


Attorneys for Defendants
Thomson Reuters Corporation and West
Publishing Corporation

Dated: January 27, 2012

CERTIFICATE OF SERVICE

I hereby certify that on this 27th day of January, 2012, I caused a true and correct copy of the foregoing Notice of Removal to be served via First Class United States Mail, postage prepaid upon the following:

Vicki Piontek, Esquire
951 Allentown Road
Lansdale, PA 19446



Joe N. Nguyen

EXHIBIT A

11-33416

Montgomery County Legal Aid Services
625 Swede Street, Norristown, PA 19401
610-275-5400

MAIL RECEIVED
2011 DEC 22
MONTGOMERY COUNTY

IN THE COURT OF COMMON PLEAS
OF MONTGOMERY COUNTY, PENNSYLVANIA
CIVIL ACTION-LAW

2011 DEC 22 A 9:15

Ronald Beverly, Sr.
1805 Elston Street
Philadelphia, PA 19126

Plaintiff

Vs.

Thompson Reuters Corporation
3 Times Square
New York, NY 10036

and

West Publishing Corporation
610 Opperman Drive
Saint Paul, MN 55123-1340

and

John Does 1-10

and

X, Y, Z Corporations

Defendant

Jury Trial Demanded

COMPLAINT

INTRODUCTION

1. This is a lawsuit for damages brought by an individual consumer for Defendant(s)' alleged violations of the Fair Credit Reporting Act (FCRA), and the Fair and Accurate Credit Transaction Act (FACTA), 15 U.S.C. 1681, et seq.



2011-33416-0002
12/22/2011 2:12:12 PM
Complaint In
Receipt # Z1403215 Fee \$0.00
Mark Levy - Montgomery County Prothonotary

[Handwritten signature]

EXHIBIT B

24

IN THE COURT OF COMMON PLEAS
OF MONTGOMERY COUNTY, PENNSYLVANIA
CIVIL ACTION-LAW

Ronald Beverly, Sr.
1805 Elston Street
Philadelphia, PA 19126

Plaintiff

Vs.
Thompson Reuters Corporation
3 Times Square
New York, NY 10036
and
West Publishing Corporation
610 Opperman Drive
Saint Paul, MN 55123-1340
and
John Does 1-10
and
X,Y, Z Corporations

2011-33416

Jury Trial Demanded

Defendant

11 DEC 28 AM 10:21
OFFICE OF THE
PROthonARY
MONTGOMERY COUNTY PA

NOTICE TO DEFEND

You have been sued in Court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this Complaint and Notice are served by entering a written appearance personally or by attorney and filing in writing with the Court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the Court without further notice to you for any money claimed in the Complaint or for any other claim or relief requested by Plaintiff(s). You may lose money or property or other rights important to you.

LAWYER REFERENCE SERVICE
MONTGOMERY COUNTY BAR ASSOCIATION
100 West Airy Street (REAR), NORRISTOWN, PA 19401
(610) 279-9660, EXTENSION 201

Montgomery County Legal Aid Services
625 Swede Street, Norristown, PA 19401
610-275-5400

MAIL RECEIVED
PROTHONOTARY
MONTGOMERY COUNTY
2011 DEC 28 A 8:56

IN THE COURT OF COMMON PLEAS
OF MONTGOMERY COUNTY, PENNSYLVANIA
CIVIL ACTION-LAW

Ronald Beverly, Sr.
1805 Elston Street
Philadelphia, PA 19126

Plaintiff

Vs.
Thompson Reuters Corporation
3 Times Square
New York, NY 10036
and
West Publishing Corporation
610 Opperman Drive
Saint Paul, MN 55123-1340
and
John Does 1-10
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X,Y, Z Corporations

2011-33416

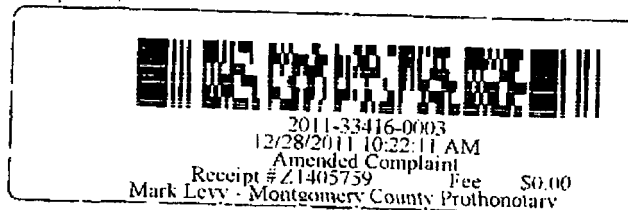
Jury Trial Demanded

Defendant

PLAINTIFF'S FIRST AMENDED COMPLAINT

INTRODUCTION

1. This is a lawsuit for damages brought by an individual consumer for Defendant(s)' alleged violations of the Fair Credit Reporting Act (FCRA), and the Fair and Accurate Credit Transaction Act (FACTA), 15 U.S.C. 1681, et seq.



MB

JURISDICTION AND VENUE

2. All previous paragraphs of this complaint are incorporated by reference and made a part of this complaint
3. Venue is proper in this District because Defendant(s) do(es) business in this jurisdiction and avails itself of the benefits of the market in this jurisdiction.
4. Similar litigation is pending in this jurisdiction.
5. Witnesses involved in the case are located at or near this jurisdiction.

PARTIES

6. All previous paragraphs of this complaint are incorporated by reference and made a part of this complaint.
7. Plaintiff is Ronald Beverly, Sr., an adult individual with a current address of 1805 Elston Street, Philadelphia, PA 19126.
8. Defendants are the following individuals and business entities.
 - a. Thompson Reuters Corporation, a corporation with a an address including but not limited to 3 Times Square, New York, NY 10036.
 - b. West Publishing Corporation, a corporation with a an address including but not limited to 610 Opperman Drive, Saint Paul, MN 55123-1340.
 - c. John Does 1-10, individuals or business entities whose identities are not know to Plaintiff at this time, but which will become known upon proper discovery. It is believed and averred that such Does played a substantial role in the commission of the acts described in this complaint.
 - d. X,Y,Z Corporations, business identities whose identities are not know to Plaintiff at this time; but which will become known upon proper discovery. It is believed and averred that such entities played a substantial role in the commission of the acts described in this complaint.

**COUNT ONE: Violation of the Fair Credit Reporting Act and the Fair and Accurate
Credit Transactions Act, 15 USC 1681 et. seq.
Failure to Provide Plaintiff With Copy of Plaintiff's Consumer Report(s)**

9. All previous paragraphs of this complaint are incorporated by reference and made a part of this complaint.

PLAINTIFF'S STATUS AS A CONSUMER, 15 USC 1681a (c)

10. At all times mentioned herein Plaintiff was a consumer as defined by 15 USC 1681.
11. At all times mentioned herein Plaintiff was a person as defined by 15 USC 1681a (c).
12. At all times mentioned herein Plaintiff was an individual as defined by 15 USC 1681a (c).

CONSUMER REPORT

13. At all times mentioned in this Complaint, Defendant(s) maintained a "consumer report" on Plaintiff as defined by 15 USC 1681(a)(d), as follows.

(d) Consumer Report.—

(1) In general.— The term "consumer report" means any written, oral, or other communication of any information by a consumer reporting agency bearing on a consumer's credit worthiness,^[1] credit standing, credit capacity, character, general reputation, personal characteristics, or mode of living which is used or expected to be used or collected in whole or in part for the purpose of serving as a factor in establishing the consumer's eligibility for

- (A)** credit or insurance to be used primarily for personal, family, or household purposes;
- (B)** employment purposes; or
- (C)** any other purpose authorized under section 1681b of this title.

14. The report maintained by Defendant(s) on Plaintiff was a written communication.

15. The written report maintained by Defendant(s) had a bearing on Plaintiff's credit worthiness, credit capacity, character, general reputations, personal characteristics or mode of living for reasons including but not limited to the following.

- a. The report contained information about Plaintiff's address(es) and residential history.
- b. The report contained telephone numbers pertaining to Plaintiff.
- c. The report contained information pertaining to Plaintiff's assets.
- d. The report contained information about Plaintiff's phone numbers.
- e. The report contained information about Plaintiff's Social Security Number.

16. The report maintained by Defendant(s) on Plaintiff was a consumer report because the report would reasonably be expected to be used or collected in whole or in part for the purpose of serving as a factor in establishing the consumer's eligibility for credit or insurance for personal, family, or household purposes; or for employment purposes; or for any other purpose authorized under section 15 USC 1681b et. seq.

17. The report maintained by Defendant(s) on Plaintiff was a consumer report because the report would reasonably be expected to be used for consumer collection purposes as authorized by 15 USC 1681b et. seq. by virtue of Defendant's own advertising materials which lists a "skip tracer" as one of the features of subscribing to Plaintiff's service that provides such reports. See attached Exhibit A.

18. The report maintained by Defendant(s) on Plaintiff was a consumer report because the report would reasonably be expected to be used for consumer collection purposes as authorized by 15 USC 1681b et. seq. by virtue of Defendant's own advertising materials which describes records maintained on individuals which help identify assets. See Exhibit A.

21. The report maintained by Defendant(s) on Plaintiff was a consumer report because the report would reasonably be expected to be used for consumer collection purposes as authorized by 15 USC 1681b et. seq. by virtue of Defendant's own advertising materials which purport to verify the individual's SSN. See Exhibit A.
22. The report maintained by Defendant(s) on Plaintiff was a consumer report because the report would reasonably be expected to be used for consumer collection purposes as authorized by 15 USC 1681b et. seq. by virtue of Defendant's own advertising materials which purport to link the individual's SSN to other information such as addresses and telephone numbers. See Exhibit A.
23. The report maintained by Defendant(s) on Plaintiff was a consumer report because the report would reasonably be expected to be used for employment purposes as authorized by 15 USC 1681b et. seq. by virtue of Defendant's own advertising materials which purport to list criminal records on individual consumers such as Plaintiff. See Exhibit A.

DEFENDANT(S)' STATUS AS A CONSUMER
REPORTING AGENCY, 15 USC 1681a(f)

24. At all times mentioned in this Complaint, Defendant(s) was acting as a "consumer Reporting Agency" as defined by 15 USC 1681a(f) as follows.

(f)The term "consumer reporting agency" means any person which, for monetary fees, dues, or on a cooperative nonprofit basis, regularly engages in whole or in part in the practice of assembling or evaluating consumer credit information or other information on consumers for the purpose of furnishing consumer reports to third parties, and which uses any means or facility of interstate commerce for the purpose of preparing or furnishing consumer reports.

25. Defendant(s) maintained the consumer on Defendant(s) for monetary fees, dues, or on a cooperative nonprofit basis.

26. Defendant(s) regularly engage(s) in whole or in part in the practice of assembling or evaluating consumer credit information or other information on consumers for the purpose of furnishing consumer reports to third parties.

27. Defendant(s) use(s) one or more means or facility of interstate commerce for the purpose of preparing or furnishing consumer reports on Plaintiff and other consumers.

DEFENDANT'S STATUS AS A NATIONWIDE
SPECIALTY CONSUMER REPORTING AGENCY 15 USC 1681a(w)

28. At all times mentioned in this Complaint, Defendant(s) was acting as a "Nationwide Specialty Consumer Reporting Agency" as defined by 15 USC 1681a(w) as follows.

(w) Nationwide Specialty Consumer Reporting Agency.— The term "nationwide specialty consumer reporting agency" means a consumer reporting agency that compiles and maintains files on consumers on a nationwide basis relating to—

- (1) medical records or payments;
- (2) residential or tenant history;
- (3) check writing history;
- (4) employment history; or
- (5) insurance claims.

29. At all times mentioned in this Complaint, Defendant(s) compiled and maintained files on consumers on consumers on a nationwide basis.

30. At all times mentioned in this Complaint, Defendant(s) maintained consumer reports on Plaintiff and other consumers related to residential or tenant history.

**COUNT ONE: VIOLATION OF THE FAIR CREDIT REPORTING ACT AND THE
FAIR AND ACCURATE CREDIT TRANSACTION ACT, 15 USC 1681 ET. SEQ.**

31. 15 USC 1681 g et. seq. requires Defendant(s) to provide Plaintiff with one free annual credit report per year.

32. In 2011, Plaintiff contacted Defendant in writing and requested a copy of the information contained in Plaintiff's consumer report which was maintained by Defendant(s). See Exhibit B.

33. At the time that Plaintiff requested Plaintiff's consumer report from Defendant(s), Plaintiff furnished proper proof of identity and proper proof of mailing address.

34. Defendant(s) refused to provide Plaintiff with a free annual copy of Plaintiff's consumer report. See Exhibit C.

35. Defendant(s) did not have a valid or sufficient reason to refuse to send Plaintiff Plaintiff's consumer report.

36. Defendant(s) breached its / their duty under 15 USC 1681 g et. seq. to provide Plaintiff with a copy of Plaintiff's consumer report.

LIABILITY

37. It is believed and averred that the acts committed by Defendant, were willful, wanton and intentional.

38. Defendant(s) is liable for the acts committed by its agents under the doctrine of respondeat superior because Defendant's agents were acting within the scope of their employment with Defendant.

39. In the alternative, Defendant(s) is liable for the conduct of its agents / employees under the theory of joint and several liability because Defendant and its agents / employees were engaged in a joint venture and were acting jointly and in concert.

40. Any mistake made by Defendant would have included a mistake of law.

41. Any mistake made by Defendant would not have been a reasonable or bona fide mistake.

DAMAGES

At least \$1.00 actual damages for Plaintiff, including but not limited to phone, fax, stationary, postage, etc.

42. Plaintiff believes and avers that he is entitled to \$1,000.00 statutory damages Plaintiff pursuant to 15 USC 1681 et. seq..

43. Plaintiff believes and avers that Defendant's conduct was willful, wanton and intentional, and therefore Plaintiff requests punitive damages.

44. Plaintiff requests punitive damages against Defendant in the amount to be determined by this Honorable Court.

45. For purposes of a default judgment, Plaintiff believes and avers that the amount of such punitive damages should be no less than \$5,000.00 because Defendant(s) actions were had the effect of compromising the integrity of 15 USC 1681 et. seq.

ATTORNEY FEES.

46. Plaintiff is entitled to attorney fees pursuant to 15 USC 1681 et. seq., in the amount of \$1,400.00 at a rate of \$350.00 per hour, enumerated below.

- | | |
|---|---|
| a. Consultations with client for the purpose of obtaining Plaintiff's consumer report and reviewing this litigation. In person and by phone | 1 |
| b. Drafting, editing, review and filing of complaint, exhibits and related documents, | 1 |
| c. Follow up contact with Defense | 2 |

4 x \$350 = \$1,400

47. Plaintiff's attorney fees continue to accrue as the case move forward.

48. The above stated attorney fees are for prosecuting this matter and reasonable follow up.

OTHER RELIEF

49. Plaintiff seeks and Order from this Honorable Court, or other Court of competent jurisdiction, directing Defendant to Provide Plaintiff with his credit report once per year, free of charge.
50. Plaintiff requests a jury trial in this matter.
51. Plaintiff demands a jury trial in this matter.
52. Plaintiff seeks such other relief as this Honorable Court may deem just and proper.

Wherefore, Plaintiff demands judgment against Defendant(s) in the amount of no less than \$7,401.00 as enumerated below.

\$1.00 more or less actual damages.

\$1,000.00 statutory damages pursuant to 15 USC 1692k et. seq.

\$1,400.00 attorney fees

\$5,000 punitive damages

\$7,401.00

Plaintiff seeks such additional relief as the Court deems just and proper.

Vicki Piontek
Vicki Piontek, Esquire
Supreme Court ID Number 83559
Attorney for Plaintiff
951 Allentown Road
Lansdale, PA 19446
717-533-7472
Fax: 866-408-6735
palaw@justice.com

12-24-2011
Date

Searching with a Person's Name or Address

Database name	Database Identifier	Required search terms	Records may include	Coverage
People Finder-Name Tracker ¹	PEOPLE-NAME	Last name	<ul style="list-style-type: none"> • Occupant's name • Last known residence • Telephone number • Neighbor information 	All 50 states and DC (access PEOPLE-XX for individual state records ²)
People Finder-Historic Tracker	PEOPLE-FIND	Name or Street address or Social Security number	<ul style="list-style-type: none"> • Individual's name • Partial Social Security number • Approximate date of birth • Telephone numbers • Last known address • Previous addresses 	All 50 states, DC, PR, VI, and GU (access PEOPLEFIND-XX for individual state records ²)
People Finder-Skip Tracer ¹	PEOPLE-TRACK	Last name and Address	<ul style="list-style-type: none"> • Head of household's name • Head of household's new address • Last known residence • Previous telephone number • Neighbor information 	All 50 states and DC
People Finder Household-Centric Records-Combined ¹	PEOPLE-HH	Name or Date of birth or Address or Telephone number	<ul style="list-style-type: none"> • Head of household's name • Head of household's date of birth • Head of household's marital status • Household address/residence type • Telephone number/service type • Names of individuals in household 	All 50 states and DC (access PEOPLEHH-XX for individual state records ²)
Person-Verify	PERSON-VERIFY	First name and Last name and State and ZIP code	<ul style="list-style-type: none"> • First and last name • Address • Telephone number • Whether on do-not-call list • Score indicating degree of match between name and address 	All 50 states and DC
New Movers	NEWMOVERS	Name or Address or Telephone number	<ul style="list-style-type: none"> • Head of household's name • Head of household's age range • Head of household's ethnicity • Head of household's address 	All 50 states and DC
People Finder-Credit Header-Privacy Restricted Use ¹	PEOPLE-CH	Name Search: Last name and State or ZIP code Address Search: Street address and City and state or ZIP code SSN Search: Social Security number	<ul style="list-style-type: none"> • Individual's name • Partial Social Security number • Name and current address associated with the Social Security number 	All 50 states and DC
Driver's License-Wallet Data ^{1,3}	DLWALLET	Name Search: Last name and State issuing driver's license or ZIP code or Date of birth Address Search: Street address and ZIP code DL Number Search: Driver's license number and State issuing driver's license SSN Search: Social Security number	<ul style="list-style-type: none"> • Name • Partial Social Security number • Approximate date of birth • Gender • Address • License type and expiration date 	Current coverage: FL, ID, LA, MD, ME, MN, MO, MS, ND, SC, TN, TX, and WI

¹ Use of data restricted by Gramm-Leach-Bliley Act or other federal privacy laws.² XX represents a state's two-letter postal abbreviation, e.g., PEOPLE-CH.³ Use of data restricted by the Driver's Privacy Protection Act of 1994.⁴ Use of data restricted by various state elections laws.

EXHIBIT A

Public Records Databases

- Westlaw provides legal professionals with a comprehensive collection of databases containing public, publicly available, and proprietary information on individuals and businesses.
- These records
 - help identify assets and determine ownership of real property, motor vehicles, watercraft, aircraft, and corporate stock
 - help locate individuals
 - help identify encumbrances and adverse filings, such as bankruptcy filings, liens, judgments, and UCC filings
- These databases also contain valuable information to assist in preparing for litigation, such as the status of an existing action or the name of a registered agent.

Public Records Tabbed Page

Westlaw

Law School Westlaw News & Research Trail Help

Assets

Verify, locate and determine ownership interests in real property and personal property assets of individuals and companies.
Asset Locator Combined, Real Property Records Combined, Motor Vehicles, Insider Stock Records, Aircraft, Watercraft, State Files

Business Locators

Locate businesses, identify contacts, and determine basic company information including address, phone number, company description, and SIC codes.
D&B Business Directory, US and Canada Business Finder, Combined, Business Tracker, Business Locator Abstracts, State Files

People

Find or verify current or historical names, aliases, locations, addresses, phone numbers, birth dates, SSN's, neighbors, affiliations, and death records associated with individuals.
Person Tracker, Name Tracker, Telephone Tracker, Address Verification, SSN Verification, Death Records, Executive Affiliations, State Files

Business & Corporate

Verify corporate registration and identify officers, directors, and company financials through public Business & Corporate Filings, Fictitious Business Names, C Preparation, Business Name Files

Litigation & Court Records

Search for court records, dockets, and filings, litigation history, and potentially negative public information about individuals and companies.
Adverse Filings Combined, Bankruptcy Filings, Lien & Judgments, Lawsuit Filings, UCC Filings, WestDockets, Jury Verdicts, UCC, Liens, Judgments Combined, Criminal Records, State Files

Recent Databases

Favorite Databases

View Westlaw Directory

View Westlaw Public Records

Westlaw Alerts

Profile Alerts

Select a database

News & Business Investigation Company Information Real Estate Business Dossier Report Manager Westlaw Privacy Policy

This tab page includes links to Assets, Adverse Filings, Court Records, Corporate Information, People Locators, and Licensing Information, and much more. Not all public record databases can be accessed using a law student password.

Public Record Databases

- West complies with all applicable federal, state, and local laws in the way Westlaw public record databases are created and made available to the public. The databases provide high-quality information to legal professionals for use in investigations, due diligence reviews, and people finding.
- Some databases require that you indicate the purpose of the search before running the search.
- Most searches can be limited to a specific state(s) by use of a state-specific database, i.e., PEOPLE-XX (where XX is the state's two-letter postal abbreviation) or by a state(s) selection option on the database Search page.

Assets Databases

- Asset Locator (ASSET-ALL) searches all assets in 47 states. (XX-ASSET), where XX is a state's two-letter postal abbreviation) searches for assets in an individual state.
- Aircraft Records (AIRCRAFT) lists information upon registration by the Federal Aviation Administration.
- Motor Vehicle Records—Combined (DMV-ALL) indicates owner associated with vehicle's license plate number.
- Stock (STOCK) contains current information on stock holding and transactions involving at least 10 percent of stock in public companies.
- Watercraft Records (WATERCRAFT) lists U.S. Coast Guard records for both recreational and merchant vessels.
- Real Property Tax Assessors and Transaction Records—Combined (RP-ALL, RPALL-XX) contains abstracts of real property records maintained by local tax assessors and transactions derived from local registrars of deeds.

People Finder Database

Examples

- Death Records (DEATH) lists deceased individuals whose deaths were reported to the Social Security Administration.
- Person Profile Search (P-PROFILE) lists person's name and potential aliases; addresses; telephone number; motor vehicle and driver's license information; names of individuals that may live or had lived at the person's addresses; and adverse filings, such as bankruptcy, liens, and judgments.
- People Finder Credit Header Name and Address Tracker (PEOPLE-CHADDOR)
- People Finder Credit Header Social Security Number Tracker (PEOPLE-CHSSN)

People Finder Database Examples

- People Finder Social Security Number Alert (SSN-ALERT) warns of Social Security numbers that were never issued by the Social Security Administration.
- People Finder Telephone Tracker (PEOPLE-PHONE)
- People Finder Name Tracker (PEOPLE-NAME) and People Finder for individual states (PEOPLE-XX), where XX is a state's two-letter postal abbreviation)
- People Finder Skip Tracer (PEOPLE-TRACK) tracks previous addresses.

Name: Ronald Joseph Beverly, Sr.1805 Elston StreetPhiladelphia PA 19126

BILL-MILLER, JR.

2011 OCT 11 PM 2 02

West Publishing Corporation
610 Opperman Drive
Saint Paul, MN 55125-1340

Ronald Joseph Beverly, Sr.

(Name of Consumer)



(Social Security Number of Consumer)

To Whom it May Concern:

I was not recently denied credit, but I would like to request a free copy of my report anyway. I have not obtained a copy of my report in the last 365 days.

Enclosed please find a copy of my FA ID card.

Thank you.

Sincerely,

Gloria Bryant
Notary Public

Ronald J. Beverly, Sr. 10/05/2011
Signature Date

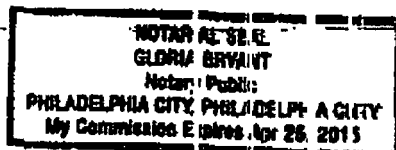
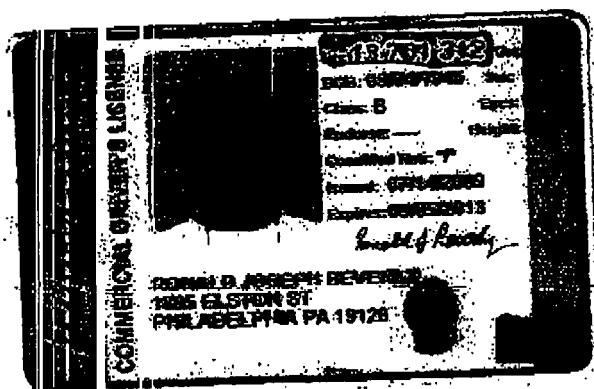


EXHIBIT B-1

10/19/2011 09:22 FAX 2152245510

The Printed Word, Inc.

003/003



EXHIBIT

B-2

10/19/2011 09:21 FAX 2152245510

The Printed Word, Inc.

001/003



THOMSON REUTERS

Accounts Receivable

10/11/2011

RONALD JOSEPH BEVERLY SR
1805 ELSTON ST
PHILADELPHIA PA 19126

Your request for a copy of a credit report was sent to West Publishing Company in error. We are a publishing company, not a credit bureau. Please contact your credit bureau for this information.

Thomson West
Credit Dept D6-11
610 Opperman Drive
Eagan, MN 55123

EXHIBIT C

Tel: 800-294-9378
Fax: 651-687-4601

west.arsupportstaff@thomson.com

thomsonreuters.com

IN THE COURT OF COMMON PLEAS
OF MONTGOMERY COUNTY, PENNSYLVANIA
CIVIL ACTION-LAW

Ronald Beverly, Sr.
1805 Elston Street
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Plaintiff

Vs.

Thompson Reuters Corporation
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New York, NY 10036

and

West Publishing Corporation
610 Opperman Drive
Saint Paul, MN 55123-1340

and

John Does 1-10

and

X,Y, Z Corporations

Defendant

Jury Trial Demanded

VERIFICATION

I, Ronald Beverly, Sr., affirm that the statements contained in the attached complaint are true and correct to the best of my knowledge understanding and belief.

Ronald Beverly Sr. 12/20/2011
Ronald Beverly, Sr. Date